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NORTH AMERICAN TITLE INSURANCE COMPANY and
NORTH AMERICAN TITLE COMPANY

DESIGNATED LOCAL COUNSEL FOR SERVICE
PER L.R. IA 11-1(b)

Gary L. Compton, State Bar No. 1652
2950 E. Flamingo Road, Suite L
Las Vegas, Nevada 89121

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

BANK OF AMERICA, N.A.,

Plaintiff,

vs.

NORTH AMERICAN TITLE GROUP, INC.
et al.,

Defendants.

Case No.: 2:20-cv-01514-RFB-VCF

**STIPULATION FOR DISMISSAL OF
CLAIMS AGAINST NORTH
AMERICAN TITLE COMPANY**

Defendants North American Title Insurance Company (“NATIC”) and North American Title Company (“NATC”), on the one hand, and plaintiff Bank of America, N.A. (“BANA”), on the other hand, hereby stipulate and agree as follows:

WHEREAS, BANA has asserted certain claims in this action relating to a policy of title insurance numbered 45002-07-10648-02 (the “Policy”) underwritten by NATIC;

WHEREAS, BANA contends that NATC committed acts and/or omissions described in the complaint. NATIC contends that, NATC, which is registered as a title agent under Nevada law, cannot be independently liable for claims in the alleged acts and/or omissions in the complaint;

1 **WHEREAS**, BANA has asserted claims against NATIC and NATC in this action relating
2 to the issuance of the Policy;

3 **WHEREAS**, NATIC agrees to assume liability for the claims that BANA has asserted
4 against NATC in BANA's complaint in this action, subject to any and all defenses that NATC
5 may have had to those claims;

6 **NOW THEREFORE**, BANA, NATIC, and NATC hereby **STIPULATE** and **AGREE** as
7 follows:

- 8 1. NATIC shall assume responsibility for any claims that BANA has asserted against
9 NATC in BANA's complaint in this action, subject to any and all defenses that NATC
10 may have had to those claims;
- 11 2. NATC is hereby dismissed from this action pursuant to Fed. R. Civ. P. 41(a); and
- 12 3. BANA waives any objection to the removal of this action from the Eighth Judicial
13 District Court to the United States District Court.

14
15 Dated: September 16, 2020

SINCLAIR BRAUN LLP

16
17 By: /s/-Kevin S. Sinclair
18 KEVIN S. SINCLAIR
19 Attorneys for Defendants
20 NORTH AMERICAN TITLE INSURANCE
COMPANY and NORTH AMERICAN
TITLE COMPANY

21 Dated: September 16, 2020

WRIGHT, FINLAY & ZAK, LLP

22
23 IT IS SO ORDERED:

By: /s/-Darren T. Brenner
24 DARREN T. BRENNER
Attorneys for Plaintiff
25 BANK OF AMERICA, N.A.

26 
27 RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

28 DATED this 16th day of September, 2020.